## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:

TRACEY LYNN ELLIS : Bankruptcy No. 24-20700 CMB

Debtor

PENNY MAC LOAN SERVICES, LLC

Movant

Chapter 13

Doc. No. 37

VS.

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TRACEY LYNN ELLIS

Respondent

Related to Claim No. 13

:

RONDA J. WINNECOUR,

and

STANDING CHAPTER 13 TRUSTEE

Additional Respondent :

## **DECLARATION REGARDING MONTHLY PAYMENT CHANGE**

AND NOW, comes the Debtor, Tracey Lynn Ellis, by and through his attorney, Jeffrey W. Ross, Esq. and Harold Shepley & Associates, LLC, and respectfully files the within Declaration Regarding Monthly Payment Change and, in support, represents as follows:

- 1. The Debtor is Tracey Lynn Ellis presently residing at 386 Florence Drive, Crecent, PA 15046.
- 2. Counsel for the Debtor is Jeffrey W. Ross, Esq. of Harold Shepley & Associates, LLC.
- 3. The mortgage company for the Debtor's residence is PennyMac Loan Services, LLC.
- The new post-petition monthly payment payable to Washington Financial Bank. beginning 1
   April 2025 is \$66.93 more than current required payment encompassing interest, principal and escrow.
- 5. Debtor's counsel has reviewed the existing plan, recomputed the plan payment and finds that the

existing payment continues to be sufficient to fund the plan.

Date: 19 March 2025

/s/ Jeffrey W. Ross
Jeffrey W. Ross, Esq.
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